

Message

From: Michael Morris [mmorris@aqmd.gov]
Sent: 11/4/2020 4:33:37 PM
To: Yannayon, Laura [Yannayon.Laura@epa.gov]
CC: Susan Nakamura [SNakamura@aqmd.gov]; Law, Nicole [Law.Nicole@epa.gov]
Subject: RECLAIM/NSR discussion

Hi Laura,

We wanted to follow up our discussion last week and see if your team had any new thoughts or guidance.

I believe your position is clear with respect to quantifying orphan shutdowns (provide supporting data) and RTCs-to-ERCs (no). We are very interested in further discussing the co-pollutant issue. We also want to know if we can proceed on changing surplus discounting for ERCs (BARCT instead of BACT discount). Lastly, we wanted to know if you had any additional thoughts regarding the three other changes to the quantification approach (calendar years, additional records, removing usage factor).

Is your team available to meet later this week?

Regards,
Mike